IN THE UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

Larry Klayman, et. al.

Appellees-Cross-Appellants,

v.

Barack Hussein Obama, et al.,

Appellants-Cross-Appellees.

Nos. 14-5005, 14-5017

Filed: 02/14/2014

APPELLEES' STATEMENT OF ISSUES FOR APPEAL

Pursuant to this Court's Order of January 13, 2014, Appellees Larry

Klayman, Charles Strange, Mary Ann Strange, Matt Garrison, and Michael Ferrari
hereby submit the following Statement of Issues to be raised in this proceeding.

- 1. Whether the Plaintiff-appellees properly pled that Mary Ann Strange uses
 Verizon and whether the district court inadvertently erred when it denied the
 Preliminary Injunction with regard to her claims?
- 2. Whether the district court erred in denying Plaintiff-appellees' Motion for Preliminary Injunction in *Klayman v. Obama*, (D.D.C., No. 13-cv-881)

Filed: 02/14/2014

("*Klayman II*") which concerns telephonic and internet metadata as well as surveillance under Section 215 of the Patriot Act, 50 U.S.C. § 1861, and Section 702 of the Foreign Intelligence Surveillance Act, 50 U.S.C. § 1881(a)?

Dated: February 14, 2014

Respectfully Submitted,

/s/ Larry Klayman

Larry Klayman, Esq. D.C. Bar No. 334581 2020 Pennsylvania Ave. NW #345 Washington, DC 20006

Tel: (310) 595-0800

Email: leklayman@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2014, I electronically filed the foregoing with the Clerk of the Court by using the appellate CM/ECF system.

I certify that the participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

Respectfully Submitted,

/s/ Larry Klayman

Larry Klayman, Esq. D.C. Bar No. 334581 2020 Pennsylvania Ave. NW #345 Washington, DC 20006

Tel: (310) 595-0800

Email: leklayman@gmail.com